

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

Case No.: 1:20-CR-254

JIN HORNG HONG,

Hon. Anthony J. Trenga

Defendant.

MOTION FOR ENTRY OF SECOND CONSENT ORDER REGARDING PASSPORT

COMES NOW the Defendant, JIN HORNG HONG, and hereby moves for the entry of a Second Consent Order regarding the return of Defendant Jin Horng Hong's passport which is currently in his possession pursuant to the Order of the Court entered October 1, 2021 directing return of the passport to Probation/Pretrial Services by October 29, 2021. Mr. Hong obtained the passport from the US Probation Office but before he could get to the appropriate office of the Government of Taipei for renewal and registration purposes, his wife delivered their new baby girl by C-Section and he will now need additional time for that process to be completed. A proposed order is filed herewith directing the return of the passport on or before December 8, 2021 which is the date currently set for a status hearing in this matter. The United States has authorized me to represent that it concurs with this motion.

WHEREFORE, Defendant prays that an appropriate Order issue.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing was electronically filed and served via the Court's CM/ECF system to all counsel of record this 21st day of October, 2021.

/s/

Gregory E. Stambaugh
VSB # 16089